CTEH THE SCIENCE OF READY™

South 4 Group Fire

Port Neches, TX

Environmental Sampling Reduction Plan

Prepared on Behalf of:

TPC Group

Prepared By:

CTEH, LLC

5120 Northshore Drive

Little Rock, AR 72118

501-801-8500

December 9, 2019

	Name/Organization	Signature	Date Signed
Prepared by:	Dana Szymkowicz, PhD; CTEH	Dana Szymkowicz	12/9/2019
Reviewed by:	Shawn Wnek, PhD, DABT; CTEH		12/9/2019
Reviewed by:	Pablo Sanchez Soria, PhD, CIH; CTEH		
Approved by:			
Approved by:			
Approved by:			
Approved by:			
Approved by:			

Introduction

In response to the South 4 Group Fire and at the request of TPC Group with Unified Command, CTEH® has been asked to collect surface water samples at locations throughout the TPC Group and Joint Waste Water Treatment Plant (JWWTP) facilities in Port Neches, TX. These sampling event requests have been driven by concerns over the potential presence of volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), per- and polyfluoroalkyl substances (PFAS), and asbestos in waste water effluents and outfalls both on- and off-site. These surface water samples will be used to delineate and evaluate the extent of potential impact and contamination across the various on-site and downstream water bodies.

CTEH® has been collecting surface water samples daily since November 28, 2019. As of December 9, 2019, 17 surface water sampling stations have been established, five of which are sampled twice a day and four of which are sampled once daily. The remaining eight locations have been selected for discrete sampling events and are not continuously being sampled (i.e., sampled upon request from Unified Command). As of December 7, 2019, approximately 133 surface water samples have been collected and submitted for laboratory analysis, and results from approximately 96 surface water samples have been received.

In accordance with the Environmental Sampling and Analysis Plan (ESAP), surface water samples have been collected in laboratory-supplied sample containers and submitted to Pace Analytical Services (Pace Labs) and/or EMSL Analytical Inc. (NELAP accredited laboratories) for analysis of various constituents of concern. Surface water samples were analyzed for various constituents as described in the ESAP and compared to TCEQ Contact Recreation Water Protective Concentration Levels (PCLs) and the USEPA Water Quality recommendation for asbestos in drinking water. To date, no exceedances of applicable TCEQ Contact Recreation PCLs or asbestos screening levels have been documented at off-site locations.

Surface Water Sampling Reductions

Given the number of samples collected to date that have shown no exceedances of applicable TCEQ health-protective screening levels, CTEH® proposes to continue collecting surface water samples daily throughout the response and during cleanup activities, while recommending a reduction in redundant sampling locations downstream of the JWWTP, as well as a reduction in sampling frequency to once per day, at most. A map of the proposed sampling locations is provided in **Attachment A.** Five locations will continue to be sampled once daily based on their location in proximity to the TPC facility, waste water outfalls, and off-site locations (WS002, WS003, WS006, WS010, WS017). Five additional locations will be sampled by request only, when/if the occurrence of rain events results in drainage changes downstream of the JWWTP (WS001, WS004, WS005, WS015, W016).

In addition to reducing sampling locations and frequencies, CTEH will discontinue asbestos analysis for surface water samples. As of December 7, 2019, all of the surface water samples collected and analyzed outside of the TPC facility showed no detectable asbestos fibers above the drinking water maximum contaminant level (MCL) established by USEPA. Furthermore, according to the USEPA Framework for Investigating Asbestos-Contaminated Superfund Sites[1], "*...ingestion of asbestos via drinking water has not historically been considered an important exposure route when compared to*

[1] USEPA, 2008: https://semspub.epa.gov/work/HQ/175329.pdf

inhalation." While asbestos was initially a constituent of concern to determine the potential for gross contamination after the fire, ingestion of asbestos fibers is not anticipated to present a health risk, particularly as the surface water sampled is not intended for human consumption.

Surface water sampling will continue as proposed in this environmental sampling reduction plan, until Unified Command deems appropriate, based on additional sample results and on-site operations.

Management of Change

Change from version 1.0 to 1.1

- *In the section titled:*

	Name/Organization	Signature	Date Signed
Prepared by			
Reviewed by			
Approved by			
Approved by			
Approved by			
Approved by			

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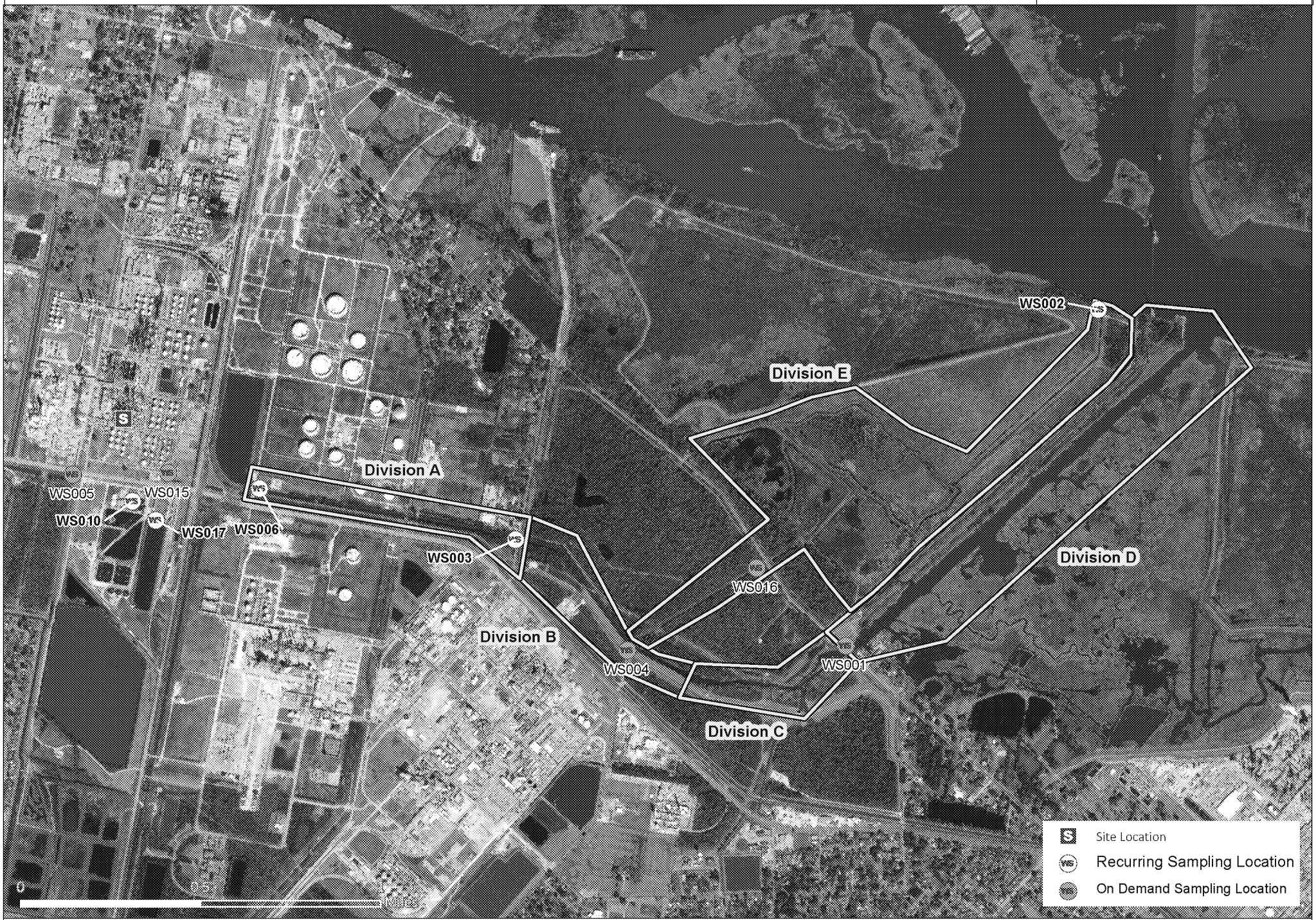
Attachment A

CTEH

Water Sampling Locations (Environmental Sampling Reduction Plan)

South 4 Group Fire | Port Neches, TX

Project: 112312
Client: TPC Group
City: Port Neches, TX
County: Jefferson



Projection System: Transverse Mercator Datum: NAD 1983 2011 StatePlane Mississippi East FIPS 2301 Ft US Last Updated: 12/10/2019 7:48:10 AM

*GPS Coordinates are Approximate

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